

Exhibit 6

Highly Confidential - Subject to Further Confidentiality Review

1 IN THE UNITED STATES DISTRICT COURT
 2 FOR THE EASTERN DISTRICT OF OHIO
 3 EASTERN DIVISION
 4 - - -
 5 IN RE: NATIONAL : MDL NO. 2804
 6 PRESCRIPTION OPIATE :
 7 LITIGATION :
 8 -----
 9 : CASE NO.
 10 : 1:17-MD-2804
 11 THIS DOCUMENT :
 12 RELATES TO ALL CASES : Hon. Dan A.
 13 : Polster
 14 -----
 15 SUPREME COURT OF THE STATE OF NEW YORK
 16 COUNTY OF NEW YORK
 17 IN RE OPIOID : Index No. 400000/2017
 18 LITIGATION : Suffolk County
 19 -----
 20 CIRCUIT COURT OF COOK COUNTY
 21 COOK COUNTY, ILLINOIS
 22 THE PEOPLE OF THE : Case No. 2017L 013180
 23 STATE OF ILLINOIS, : Consolidated with
 24 AND COOK COUNTY : 2018L 3908 (JERSEY COUNTY)
 25 ILLINOIS : 2018L 2943 (KANE COUNTY)
 26 : 2018L 2916 (MACON COUNTY)
 27 V. : 2018L 2948 (MCHENRY
 28 : COUNTY)
 29 : 2018L 3728 (LAKE COUNTY)
 30 PURDUE PHARMA, L.P. : 2018L 3909 (UNION COUNTY)
 31 ET AL. :
 32 - - -
 33 JENNIFER ALTIER
 34 Thursday, August 2, 2018
 35 - - -
 36 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
 37 CONFIDENTIALITY REVIEW
 38

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1 APPEARANCES:
 2
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1 - - -
 2 Videotaped deposition of
 3 JENNIFER ALTIER, taken pursuant to
 4 notice, was held at the law offices of
 5 Carella Byrne Cecchi Olstein Brody & Agnello,
 6 PC, 5 Becker Farm Road, Roseland, New Jersey
 7 07068, beginning at 9:05 a.m., on the above
 8 date, before Amanda Dee Maslynsky-Miller, a
 9 Certified Realtime Reporter.
 10
 11 - - -
 12
 13
 14
 15
 16 GOLKOW LITIGATION SERVICES
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 39
 40
 41
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1 BY MS. BAIG:
2 Q. Well, do you know whether
3 there was a sales rep in Ohio?
4 A. I assume there was, yes.
5 Q. Are you aware that Actavis
6 sells opioids in Ohio?
7 MR. ROTH: Object to the
8 form. Vague as to time frame and
9 who you're talking about.
10 BY MS. BAIG:
11 Q. When you were there.
12 A. And by "sell opioids,"
13 promote opioids to physicians?
14 Q. Yes.
15 A. So if we had a sales rep
16 there, yes, they were promoting opioids
17 to physicians.
18 Q. Do you know who that sales
19 rep was?
20 A. No.
21 Q. If you wanted to find out
22 who that sales rep was, who would you go
23 to?
24 A. I would probably call one of

1 A. That's correct.
2 Q. Why were you hired?
3 A. I was hired because Actavis
4 had just received a warning letter,
5 earlier that year, on the promotional
6 materials they were using, and I was
7 brought in to create new materials.
8 Q. What process did you go
9 through to revise the company's
10 promotional materials for Kadian?
11 A. Sure. We created materials
12 that were based exclusively on the
13 product label, approved by the FDA. I
14 like to -- I always used to like to call
15 it a colorful PI.
16 We created those materials,
17 we submitted them through our promotional
18 review committee process, which consisted
19 of legal and regulatory review, to make
20 sure that we were compliant. And those
21 materials were produced and given to the
22 sales force.
23 Q. And how would you describe
24 the marketing materials you produced for

1 the sales directors.
2 MS. BAIG: I have no further
3 questions. Thank you.
4 THE WITNESS: Thank you.
5 MR. ROTH: Can we take a
6 short break, so I can consult with
7 co-counsel, and then we'll come
8 back on?
9 VIDEO TECHNICIAN: The time
10 is 4:04 p.m. Off the record.
11 - - -
12 (Whereupon, a brief recess
13 was taken.)
14 - - -
15 VIDEO TECHNICIAN: We are
16 back on the record. The time is
17 4:16 p.m.
18 - - -
19 EXAMINATION
20 - - -
21 BY MR. ROTH:
22 Q. Ms. Altier, you testified
23 earlier that you joined Actavis in the
24 summer of 2010; is that correct?

1 Kadian?
2 A. Let's see. Benign,
3 conservative, very straightforward,
4 modeled after the label.
5 Q. What interaction did you
6 have with the inVentiv sales reps during
7 your tenure at Actavis while the inVentiv
8 contract was still ongoing?
9 A. Sure. My role was marketing
10 director, I would present the marketing
11 materials to them.
12 Q. And how would you describe
13 the inVentiv sales reps' promotion of
14 Kadian?
15 A. Again, you know, they were
16 trained on what -- the safety and the
17 efficacy of the product; they stuck to
18 the materials that they were given, which
19 was, basically, you know, a colorful
20 version of the PI; instructed to provide
21 appropriate safety that was in the
22 materials with every detail.
23 Q. Did Actavis ever hire a
24 speakers bureau for Kadian?

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1 A. No.

2 Q. Did Actavis ever sponsor a

3 continuing medical education seminars

4 related to Kadian?

5 A. No.

6 Q. Did Actavis ever fund

7 clinical or other scientific studies for

8 the purpose of promoting Kadian?

9 A. Not during my tenure, no.

10 Q. Did Actavis ever hire key

11 opinion leaders for the purposes of

12 promoting Kadian?

13 A. No.

14 Q. Did Actavis ever engage pain

15 advocacy or other patient advocacy

16 organizations for the purposes of

17 promoting Kadian?

18 A. No.

19 Q. Why did Actavis adopt such a

20 benign and conservative marketing

21 strategy for Kadian?

22 A. We were at the end of our

23 product lifecycle. Generic competition

24 was imminent. Our goal was to maintain

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1 - - -

2 BY MS. PINCUS:

3 Q. Ms. Altier --

4 VIDEO TECHNICIAN: So you

5 probably do want to come because

6 you need a microphone.

7 - - -

8 (Whereupon, a discussion off

9 the record occurred.)

10 - - -

11 BY MS. PINCUS:

12 Q. Good afternoon, Ms. Altier.

13 My name is Lauren Pincus, and I'm here on

14 behalf of Rochester Drug Cooperative.

15 I realize it's been a long

16 day, so I'll try and be brief.

17 A. Thank you.

18 Q. Are you familiar with

19 Rochester Drug Cooperative?

20 A. No.

21 Q. Do you recall having any

22 dealings with Rochester Drug Cooperative

23 during your time at Actavis?

24 A. No, not that I recall.

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1 product share.

2 Q. When did Actavis stop

3 detailing physicians and pharmacies for

4 Kadian in person?

5 A. The merger with Watson, the

6 Watson management made the decision to

7 let the sales force go at the end of

8 2012.

9 Q. We saw some documents and

10 heard testimony today related to MoxDuo.

11 Do you remember that?

12 A. I do.

13 Q. Was MoxDuo ever marketed or

14 sold?

15 A. It was not.

16 Q. And why not?

17 A. It was not approved by the

18 FDA.

19 MR. ROTH: That's all I have

20 for now.

21 MS. BAIG: I have nothing

22 further.

23 - - -

24 EXAMINATION

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1 MS. PINCUS: No further

2 questions.

3 MR. ROTH: Does anyone on

4 the phone have any questions for

5 the witness?

6 MR. DIAMANTATOS: Yes. This

7 is Tinos Diamantatos, from Morgan

8 Lewis on behalf of the Teva

9 defendants.

10 - - -

11 (Whereupon, a discussion off

12 the record occurred.)

13 - - -

14 BY MR. DIAMANTATOS:

15 Q. Can you hear me now?

16 A. Yes.

17 Q. Terrific.

18 Ms. Altier, how are you?

19 Nice to meet you --

20 MS. BAIG: Have you

21 cross-noticed this deposition?

22 Who is taking questions now,

23 exactly.

24 MR. DIAMANTATOS: I can't

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